

October 31, 2000

Tim Clear
TMDL Coordinator
Water Quality Division
VT Department of Environmental Conservation
103 South Main St., Bldg. 10 N.
Waterbury, VT 05671-0408

RE: TMDL for Winooski River below Cabot Village

Dear Tim:

Based on a review of the July 2000 document, "Total Maximum Daily Load for Pathogens: Winooski River Below Cabot Village" prepared by VT DEC, we offer the following comments.

Overall, the TMDL satisfies most of EPA's requirements and we feel that relatively few revisions will be necessary for us to approve it. As with the other TMDLs submitted thus far by VT DEC, we appreciate the well organized, clear, and concise write-up consistent with the format presented in EPA's TMDL template.

Our primary concerns for approval of a final TMDL involve the following two issues:

1. Public participation in the TMDL process; and
2. The need for a follow-up monitoring program to verify assumptions regarding upstream nonpoint sources.

Detailed comments on these and other issues are in the attached document, "EPA New England's Review...". As you know, this review document provides the standardized template EPA New England is using for TMDL reviews (and approval documentation). The document includes descriptions of TMDL review elements for each section in italics, followed by:

- Our assessment of how, or documentation of the extent to which, the draft TMDL satisfies the TMDL requirements.
- Our comments/questions on what clarifications are needed for the final TMDL report submitted to EPA for approval.(Look for text introduced by "**Comments:**")

If you have any questions on these comments, please call me at 617-918-1602.

Sincerely,

Eric Perkins
Vermont State Unit
Office of Ecosystem Protection

Encl.

cc: Wallace McLean, VT DEC
Jerry Potamis, EPA (CVT)